



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 24, 2006

John Simkins
Environmental Protection Specialist
Federal Highway Administration
400 North 8th St.
Richmond, VA 23240-0249

**Subject: Harrisonburg Southeast Connector Location Study, Transportation
Improvements from US Route 11 to US Route 33, Funding and US Army COE
Section 404 Permit, City of Harrisonburg, Rockingham County, VA CEQ#
20060119**

Dear Mr. Simkins:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and Section 404 of the Clean Water Act, the Environmental Protection Agency (EPA) offers the following comments regarding the Harrisonburg Southeast Connector Study Draft Environmental Impact Statement (DEIS) located in the city of Harrisonburg and Rockingham County, Virginia. The DEIS was prepared by the Virginia Department of Transportation (VDOT) and the Federal Highway Administration (FHWA).

The Harrisonburg Southeast Connector (HSC) is a proposed new roadway, with segments on existing roads and on new location, which would connect Interstate 81 south of Harrisonburg with Rt. 33 east of Harrisonburg. The purpose of the project is to address projected growth in east-west travel movements in Rockingham County. Several previous locally sponsored transportation studies have identified numerous alternative alignments and concepts to address the east-west mobility need. After screening these and other alternatives, ten Candidate Build Alternatives (CBAs) were carried forward for detailed study including the no-build and four combination alternatives. The CBAs range from three to eight miles in length. A preferred alternative was not identified by VDOT in the DEIS.

The environmental consequences of the HSC include residential and business relocations, impacts to agricultural and forestal districts, loss of farmland and potential impacts to historic resources. Relative to other projects, small wetland (0-0.8ac) and modest stream impacts (750-4600 linear feet) are anticipated.

The key issues identified in the DEIS are potential impacts to historic resources and the potential for induced growth in the study area. Direct impacts to historic resources are principally related to CBA 1, however CBA's 2A and 3 may also have indirect effects on historic structures. There is a concern that the HSC may induce growth in what is now a largely rural area of woodlots and farms. The induced growth question is mitigated somewhat because the study area is largely contained within the county identified urban growth boundary and the majority is zoned residential, so growth is anticipated in the study area even without the HSC. Moreover, the county intends to focus growth in this area to help preserve outlying rural areas and farmland. The question of the location of new growth, depending on which CBA is selected, remains a concern as it relates to environmental or cultural impacts. For example the selection of the outlying CBA 1 may induce growth outside the study area or contribute to the conversion of unprotected civil war battlefield parcels to residential development. The FEIS should address the

issues of location specific induced development and induced growth outside the study area. The FEIS should describe conditions or practices that would mitigate these issues.

Cumulative effects are enumerated in the DEIS however only VDOT projects are included in the list, so the overall potential for cumulative effects is not fully documented. The FEIS should contain a more complete listing and discussion of all reasonably foreseeable projects, public and private, in the study area.

While the DEIS did not identify a preferred alternative, it points out that a combination of CBAs, all of which include CBA 1, may be best overall from an traffic standpoint. EPA is concerned about this because CBA 1 has the greatest potential impacts to historic resources including the Cross Keys Battlefield Historic District. The Cross Keys Battlefield was the site of the June 8, 1862 civil war battle that resulted in a confederate victory and freed up Stonewall Jackson to leave the Shenandoah Valley to join Robert E. Lee in the defense of Richmond. The Cross Keys Battlefield is an important element of the Shenandoah Valley Battlefields National Historic District established by Congress in 1996 to establish a planning process for the preservation and interpretation of the civil war battlefields in the district.

CBA 1 will utilize an existing rural road that passes though the Cross Keys Battlefield Historic District. EPA is concerned that CBA 1 will significantly increase traffic volumes in the Cross Keys Battlefield, including levels greater than the no-build condition. The FEIS should address the impacts to the battlefield's integrity and interpretability from increased traffic, particularly in light of the proposal to close existing roads in the Manassas National Battlefield due to traffic impacts. The FEIS should also include specific measures to mitigate the impact of increased traffic.

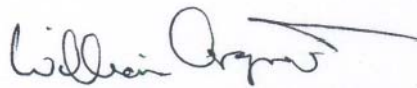
In addition to potential impacts to the Cross Keys Battlefield, more historic properties are located in proximity to CBA 1 than any other CBA. CBA 1 may have affects, adverse or otherwise, on these structures. A final determination of this effect by the State Historic Preservation Officer should be included in the FEIS and made prior to the selection of an alternative.

The FEIS should provide a more robust description of the Massanetta Springs Historic District, commensurate with that provided for the Cross Keys Battlefield.

In summary, while the impacts of the HSC appear to be relatively small as compared to other highway projects, EPA is concerned that CBA 1 has the potential degrade the quality of the Cross Keys Battlefield and has the potential to affect the most historic resources in the study area. CBA 1 also has the potential to induce growth outside the urban growth boundary established by Rockingham County. In addition, the DEIS is lacking certain data as described above. Consequently we rate the HSC with Environmental Concerns (EC) and the document (2) insufficient information. A copy of EPA's EIS rating system is attached.

Should you have any questions or comments about our comments please contact me at 215-814-3367, or Mr. Peter Stokely the project principle reviewer at 703-648-4292.

Sincerely,

A handwritten signature in black ink, appearing to read "William Arguto", with a long horizontal flourish extending to the right.

William Arguto
NEPA Team Leader

Enclosure